

### **REMARKS**

In the above-mentioned office action, all of the pending claims, claims 1-20 were rejected. Claims 1-9 and 11-19 were rejected under Section 102 over Raith (WO 98/48577). And, claim 10 was rejected under Section 103(a) over the combination of Raith '577 in view of Raith '457.

In response to the rejections of the claims, the independent claims, claims 1, 12, and 20, have been amended, in manners as set forth herein, believed better to distinguish the invention of the present application over the cited references, taken alone, or in combination.

With respect to exemplary claim 1, the claim has been amended, now to recite that the network-positioned code-delivery detector receives a network-part identifier code that forms an area-dependent short dialing code. And, the recitation of the identifier-code broadcast scheduler has been amended, now to recite that the broadcast is upon a cell broadcast channel associated with the network part for delivery to the mobile node and in which the values, when delivered thereto, are for indexing together with permanently stored values maintained at the mobile node. Claims 12 and 20 have been analogously amended.

Support for the amended recitation is found, e.g., on page 23, lines 15-16 (short dialing codes), page 24, lines 1-7 (cell broadcast channel, and page 26, lines 20-23 (indexing together with permanently stored values).

Neither of the Raith references are believed to disclose such structure or corresponding methodology. Specifically, neither the cited sections of Raith '577 disclose a detector that receives the identifier code forming an area-dependent short dialing code and also a scheduler that schedules the selected broadcast and of values that, when delivered to a mobile node are for indexing together with permanently stored values maintained at the mobile node.

Specifically, and with reference to page 8, lines 11-27 and Figure 4 of Raith '577, a different scheme is disclosed. Additional operation is required at the mobile unit to determine the current country in which the mobile unit is located. Hence, in contrast to the present invention, as now recited, Raith '577 requires a multi-step procedure, and corresponding structure, to obtain an emergency number and use the number.

The second Raith reference was cited merely for showing scheduling of a broadcast at selected intervals and was neither cited for showing, nor appears to show, the structure or methodology as now recited in the amended, independent claims.

Amendments made to various of the dependent claims are made responsive to amendments made to their respective parent claims. As the dependent claims include all of the limitations of their respective parent claims, the dependent claims are believed to be patentably distinguishable over the cited references, taken alone or in combination, for the same reasons as those given above with respect to their parent claims.

Accordingly, in light of the foregoing, independent claims 1, 12, and 20, and the dependent claims dependent thereon, are believed to be in condition for allowance. Accordingly, reexamination and reconsideration for allowance of these claims respectfully requested. Such early action is earnestly solicited.

Respectfully submitted,

/Robert H. Kelly/

---

Robert H. Kelly  
Reg. No. 33, 922

SCHEEF & STONE, L.L.P.  
5956 Sherry Lane, Suite 1400  
Dallas, Texas 75225  
Telephone: (214) 706-4201  
Fax: (214) 706-4242  
[robert.kelly@scheefandstone.com](mailto:robert.kelly@scheefandstone.com)